



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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November 17, 2008

Mike Spaits
Public Affairs Officer
96 CEG/CEVPA
Eglin AFB, Florida 32542-5000

SUBJECT: Final Environmental Impact Statement for the Proposed Implementation of the Base Realignment and Closure (BRAC) 2005 Decisions and Related Actions at Eglin Air Force Base, Florida; CEQ Number 20080417

Dear Mr. Spaits:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The United States Air Force (USAF) proposes to implement several actions related to the 2005 Base Realignment and Closure (BRAC) recommendations at Eglin Air Force Base (AFB) in Okaloosa, Santa Rosa, and Walton Counties, Florida. The specific actions that form the basis for this EIS include: 1) relocation of the Army 7th Special Forces Group (7SFG) Airborne (A) from Fort Bragg, North Carolina; and 2) establishment of the Joint Strike Fighter (JSF) Initial Joint Training Site (IJTS) at Eglin AFB.

The proposed action would locate new missions at Eglin AFB and increase Eglin's personnel and military activities over the next several years. The Air Force, Army, Navy, and Marine Corps identified four separate but interrelated activities to implement the Eglin BRAC recommendations: 1) a new cantonment area for the 7SFG(A); 2) range training areas for the 7SFG(A); 3) a new cantonment area for the JSF IJTS; and 4) flight training areas for the JSF. All activities would occur on the Eglin Reservation or within airspace associated with Eglin AFB or the Department of Defense. The total personnel gain at Eglin AFB due to the proposed action would be approximately 10,952 including military personnel, family and civilian employees.

Five proposed cantonment locations and five alternative range training areas were considered to accommodate the 7SFG(A) at Eglin AFB. Alternative 3, which included siting cantonment and training areas west of Duke Field, was chosen as the preferred alternative for both activities. A separate cantonment area is also required to accommodate JSF activities. Two locations on the Eglin Main Base were evaluated for the JSF IJTS cantonment area. Alternative 1 on the west side of the base was selected as the preferred alternative.

Two flight training alternatives, representing a range of possible training requirements and locations, were considered in the Final EIS. These two alternatives provide for a different

mix of operations at each of three airfields: Eglin Main, Duke Field, and Choctaw Field. Alternative 1, which attempts to maximize the number of operations at Duke and Choctaw Field, was selected as the preferred alternative. The remainder of the operations would be located at Eglin Main Base. Regardless of the alternative selected, the total number of flight operations should more than double with the F-35 beddown at Eglin AFB as compared to existing conditions. It is anticipated that as the JSF program evolves and matures at Eglin AFB, elements of the program may change. Consequently, the JSF will adaptively manage program issues over time throughout the delivery and basing of the aircraft through approximately 2020.

EPA appreciates the responses to our comments on the Draft EIS and also the selection of Alternative 1 as the preferred alternative for the initial operations of the JSF IJTS. Of the two alternatives considered, Alternative 1 appears to minimize overall on- and off-base noise impacts. However, based on our review of the Final EIS, EPA continues to have environmental concerns related to the proposed action, primarily associated with potential changes in air quality and extensive noise exposure. The level of noise impacts both on- and off-base is projected to increase significantly due to an approximate doubling in the level of operations associated with the introduction of the F-35 aircraft, which is also a much louder aircraft than the F-15 aircraft. The USAF recognizes the unavoidable increase in frequency and intensity of adverse noise impacts from the BRAC relocation activities. EPA recommends that the USAF make every effort to avoid and reduce the potential impacts from adverse noise exposure on- and off-base from implementation of the proposed action.

To address these impacts, the Final EIS suggests that Eglin AFB will utilize monitoring and adaptive management to allow for changes to the proposed action in the future. The Final EIS states, "The F-35 is a new weapon system which will evolve with time. Adaptive management will permit modification of management practices to achieve project objectives and environmental protection." The Final EIS included a generic description and diagram of an adaptive management process and identified a number of mitigation or management measures related to noise (and other) impacts from the proposed action. However, the majority of these measures are described as "potential" measures that could be adopted over time as the JSF training program matures at Eglin AFB. Instead of including specific measures in the Final EIS, the USAF commits to developing a mitigation plan within 90 days of the signing of the Record of Decision (ROD). Among other things, the mitigation plan will specifically identify each mitigation measure, including the type of monitoring, how the measures will be executed, and who will fund and implement the mitigation. Requiring the detailed mitigation plan after the signing of the ROD enables the mitigation plan to be tailored precisely to the decision that is made.

EPA supports the USAF efforts in the development of a comprehensive mitigation and monitoring plan. However, we have some concerns about the development of these commitments post-ROD. The ROD typically should state whether the selected alternative employs all practicable means to avoid, minimize or mitigate environmental impacts and, if not, explain why. The resource-specific measures currently described in the Final EIS are described as potential mitigation or management measures. Without inclusion of the specific measures in the ROD, it is unclear of the enforceability and accountability for ultimately implementing each

measure. Therefore, EPA proposes an approach for the inclusion of specific mitigation measures in the ROD, with further definition and specificity associated with each measure to follow in the more detailed mitigation plan. Given the above approach, EPA makes the following recommendations:

ROD

- The ROD should specifically include provisions for monitoring noise, the success of any noise mitigation measures, and procedures for making necessary adaptations.
- EPA recommends that the USAF use sound-proofing and other sound insulation measures in new building construction (e.g., dormitories, unaccompanied housing, medical clinics, chapel) and retrofitting existing buildings in the new cantonment areas to reduce interior noise levels and minimize the impacts of noise exposure at any noise sensitive sites.
- The USAF should request authorization from Congress to fund off-base noise mitigation measures, specifically to provide sound attenuation for existing facilities that are incompatible with the land use compatibility guidelines as described in the Final EIS.
- The USAF should request funds to acquire property interests from willing sellers within the 75+ DNL contours after more refined noise exposure contours are developed.
- With regards to monitoring training-related impacts in the newly established 7SFG(A) training areas, EPA recommends adoption of programs that include on-the-ground damage inspections followed by damage assessments and repair to assist in developing long-term mitigation for continuing operations.

Post-ROD Mitigation Plan

- It should include a thorough discussion of the overall adaptive management plan, including all monitoring protocols, who will be involved in making adaptive management decisions based on the monitoring results, and the initial timeframes for making any decisions.
- The USAF should make the mitigation and monitoring plan available to the public, interested stakeholders, and other agencies. It is unclear if the USAF will take public comments on the plan once it is submitted to USAF Headquarters within 90 days of signing the ROD. EPA recommends that the USAF place information about the mitigation and monitoring plan on the Eglin AFB website and take public and agency comments on the proposed mitigation plan. In developing this plan with feedback from affected stakeholders, the USAF also could potentially develop strategies and specific partners to assist in pursuing supplemental authorities or potentially additional funds to conduct specific mitigation measures.
- To ensure the fullest use of the Eglin AFB web site, EPA recommends including obvious links on the USAF website to allow for noise complaints, the availability of training schedules, and access to monitoring/mitigation updates. The USAF should inform agencies and the public on progress in carrying out mitigation measures which were adopted and make available to the public the results of relevant monitoring.
- EPA submitted comments about the proposed Northwest Florida Transportation Corridor project that were not addressed in the Final EIS. EPA recognizes that this major transportation project is still in the early planning stages. However, this project will have

the potential for significant positive and negative impacts to Eglin AFB. It could improve transportation conditions such that some of the proposed roadway projects are no longer required, and it could create conflicts with land use or training operations associated with the BRAC relocations. EPA recommends that the post-ROD plan disclose the latest information related to this project and include a commitment to revisit the effects of this project on the BRAC relocations as part of the overall adaptive management strategy once the project is further along in the development phases.

In the Draft EIS, EPA also raised concerns about potential changes in air quality associated with the proposed action and recommended several actions that Eglin AFB could implement during construction and operations to minimize air quality impacts in the future. EPA appreciates the response to our comments on air quality. It appears that the USAF is already committed to implementing a number of EPA's suggestions with regard to strategies to reduce air quality impacts. However, EPA recommends inclusion of a few additional air quality environmental performance commitments or mitigation measures as part of the ROD. These are measures that should be proactively implemented to avoid or reduce potential air quality impacts of the project. These guidelines propose the incorporation of energy-saving features in design and the use of ultra-low sulfur diesel (ULSD) fuel emission equipment and retrofit technology during construction. These measures include the following:

- Use of ultra-low sulfur diesel (ULSD) fuel in off-road construction equipment with engine horsepower (HP) rating of 60 HP and above.
- Where practicable, use diesel engine retrofit technology in off-road equipment to further reduce emissions. Such technology may include diesel oxidation catalyst/diesel particulate filters, engine upgrades, engine replacements, or combinations of these strategies.
- Limit on unnecessary idling times on diesel-powered engines to three minutes.
- Location of diesel-powered exhausts away from fresh air intakes.
- Dust control at construction sites through a soil erosion sediment control plan (this is already included as a potential mitigation measure in the Final EIS).

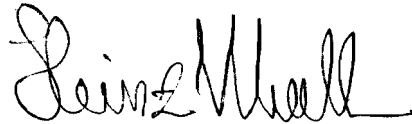
Furthermore as related to minimizing air quality impacts, EPA recommended that Eglin AFB develop additional transportation management strategies to address the transportation system deficiencies that will be created by the BRAC actions. In the Final EIS, the USAF provided a response to these comments describing primarily activities of the Okaloosa County Transit (OCT) authority, none of which appear to include any long-term connections with Eglin AFB. Transportation system management and transit improvement projects are identified as possible "mitigation measures" in the Final EIS; however no specific projects are proposed. Given the potential air quality concerns associated with significant transportation deficiencies, EPA continues to recommend that Eglin AFB develop a comprehensive alternative transportation program, especially for commuters. This program should promote telecommuting, car pooling, and establishing no-cost or low-cost mass transit (possibly hybrid electric or natural gas powered) between popular points on the base and in the surrounding communities. The Final EIS identifies that regional transportation is a continuing problem and will require a regional solution. We believe the details regarding such a program could be incorporated in the overall mitigation

plan and should identify a commitment to continue discussions with OCT to include transit improvements at Eglin AFB in their overall transportation master plan.

In summary, EPA continues to have environmental concerns related to the proposed action, primarily associated with potential increases in impacts to air quality and extensive noise exposure. However, we support the USAF in the development of comprehensive mitigation measures and monitoring programs to minimize impacts from implementation of the proposed action. EPA recommends a number of specific mitigation commitments for inclusion in the ROD and the post-ROD mitigation plan.

We appreciate the opportunity to review the proposed action. Feel free to contact me at (404) 562-9611 or Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller". The signature is fluid and cursive, with the first name "Heinz" written in a larger, more prominent script than the last name "Mueller".

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management